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**Reply to MN Address**

May 12, 2016

The Honorable Kevin W. Eide  
Carver County Justice Center  
604 East Fourth Street  
Chaska, MN 55318Re: Estate of Prince Rogers Nelson  
Court File #10-PR-16-46

Dear Judge Eide:

**I. Introduction**

This letter is submitted to advise regarding a potential heir for the above estate who is a minor. I have been told by counsel for the Special Administrator that currently, there is no attorney who has appeared on behalf of this minor. The minor will be referred to in this letter as "minor V.N."

**II. Duane Joseph Nelson, Sr.**

Duane Joseph Nelson, Sr. (hereafter referred to as "Senior"), born 8/18/58, was the half-brother of decedent for this estate, Prince Rogers Nelson (hereafter referred to as "PRN" or "Prince"). Senior's mother was the first wife of John Nelson, Prince's father. It is my reasonable assumption that his father was John Nelson, and John Nelson is presumably listed as father on Senior's birth certificate.

I have reviewed filings in this matter, and it is strange that the Petitioner had/has not listed Senior as a potential heir. In any event, Senior as a half-sibling, has predeceased decedent PRN as noted below. Near the time of Senior's death, Tyka Phillips made this statement publically:

All Glory & Honor 2 God – We Thank you from the bottom of our hearts for all of the kind words, e-mails, etc. of condolences. My brother Duane has gone to be with God – He is in a better place. Please respect our Families privacy at this time of mourning.

Senior grew up together with Prince. Senior eventually became head of security for Prince through employer, Paisley Park, but he subsequently was terminated in the mid-90's and became estranged from Prince.

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It is my reasonable belief that he was the father of two children: Brianna Nelson, who is an adult, who I believe resides in Wisconsin; and Duane Joseph Nelson, Jr. (hereafter referred to as "Junior"), who is deceased.

Senior passed away on 3/4/11 in Minneapolis due to natural causes. As such, I believe that under Minnesota law, his children and grandchildren would be considered heirs for this pending estate.

### **III. Duane Joseph Nelson, Jr.**

Junior passed away in December of 2005 suddenly and unexpectedly. At the time, he was living with a woman in Buffalo who I will identify with initials "J.H." I do not believe they were married. They had a child together – minor V.N.

At the time of Junior's death, I represented him. After his death, J.H. asked me to represent her for matters concerning Junior's estate. My representation of J.H. for that matter ended years ago. Same was litigated in Wright County.

The personal representative for that estate was a woman named Elberta Butler who was the mother of Junior, and therefore, the grandmother of minor V.N. The attorney for Ms. Butler was Lewis Seltz out of Golden Valley. I have been in close contact with Mr. Seltz for about ten days, and he is being copied on this letter which is being e-Filed today.

### **IV. Attempts To Contact Parent and Natural Guardian of Minor V.N.**

Realizing that I had what I felt was an ethical obligation to advise J.H. of the situation that her daughter could be a legitimate heir of an estate potentially valued in the hundreds of millions of dollars. I have made reasonable attempts to reach her. I have spoken with Ms. Butler personally, but she was not helpful. It is my assumption that she is estranged from J.H.

One of my investigators spoke directly with a woman I reasonably believe is the mother of J.H. That went nowhere either.

Try as I might, I have had no direct contact with J.H. I also have no idea if she is aware that I have been attempting to reach her.

### **V. Recommendation for the Court**

Under the circumstances, and considering the sensitive time nature of this matter, in the event that the minor's mother J.H. does not secure counsel for minor V.N. in the next week or so, I would respectfully request that a guardian ad litem be appointed by the State register of guardian ad litem perhaps with the involvement of Mr. Seltz since he has intimate and detailed knowledge of this family from the past case involving Junior's estate.

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**VI. Conclusion**

I look forward to your input as to how to proceed. Thank you, Your Honor.

Sincerely,



Michael B. Padden  
Attorney at Law

MBP/mls

cc: Lewis Seltz, Esq.  
Laura Krishnan, Esq., for Special Administrator